

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

IN RE NEW ENGLAND COMPOUNDING PHARMACY, INC. PRODUCTS LIABILITY LITIGATION
THIS DOCUMENT RELATES TO: All Actions Naming The Saint Thomas Outpatient Neurosurgical Center

MDL No. 2419
Dkt. No. 1:13-md-2419 (RWZ)

DECLARATION OF STEVEN GASSERT

Steven Gassert declares, under penalty of perjury on the date identified below, as follows:


1. I am the Project Manager for Epiq Systems Inc. (“Epiq”) overseeing Epiq’s role as escrow agent for the Saint Thomas Settlement Qualified Settlement Fund (the “QSF”).
2. As part of its administration of the QSF, Epiq provides the following services: 1) set up and established the escrow account with the bank holding the funds; 2) aid in the payment of individual awards to individual claimants by cutting checks and mailing checks to individual claimants; 3) aid in lien clearance and help ensure that claimants have satisfied certain lien obligations prior to payments to individual claimants; and 4) fields questions and emails from claimants and claimants’ counsel on status of payment, lien resolution, and administration.
3. Under the terms of its agreement with the Plaintiffs’ Steering Committee (“PSC”) in the above-referenced lawsuit (the “MDL”), Epiq generally charges an hourly fee ranging from \$50-\$200 for services rendered as part of its administration of the QSF. Epiq has also incurred banking, postage, and other expenses that are reimbursed as part of its agreement with the PSC. Epiq catalogues these charges and expenses in monthly invoices it sends to Gerard J. Stranch, IV at Branstetter, Stranch, and Jennings PLLC.
4. On April 30, 2017, Epiq sent two invoice to the PSC for work performed in March of 2017 in the amounts of \$526.72 and \$1,856.00.

5. On May 10, 2017, Epiq sent an invoice to the PSC for the costs incurred between April 1, 2017 and April 30, 2017 and requested payment of \$21,418.94.

6. On June 12, 2017 Epiq sent an invoice to the PSC for the costs and expenses incurred between May 1, 2017 and May 31, 2017 and requested payment of \$15,537.85.

7. In total, and through the date indicated on the below declaration, Epiq has sent a total request of payment for \$ 39,375.51. These invoices are for the work and expenses incurred on administering the QSF in Epiq's role as escrow agent for the QSF.

Executed this 26th day of June, 2017 in Portland Oregon.


Steven Gassert